

## **REMARKS**

Claims 9-16 and 22-33 have been rejected under 35 U.S.C. 103(a) as obvious over Wilson et al. in view of Alperovich, and claims 17-21 have been rejected on the same ground with respect to the same references, further in view of Lipsanen et al.

Independent claims 9 and 33 have been amended to delete the subject matter added by the Amendment filed 29 May 2009. New dependent claims 34 and 35 are here added to recite a feature described in the application at page 5, lines 3-19 (paragraph [0037] of the published application).

### **Interview**

The courtesy of Examiner Wendell in conducting telephone interviews on October 14 and 16, 2009 with Attorney Edward Callan is sincerely appreciated. The matters discussed during those interviews are described in the latter portion of the following argument under the heading, "Claim Rejections - 35 U.S.C. 103," and under the heading, "New Claims." Applicants are most grateful to Examiner Wendell for his explanation of the reason for rejecting the independent claims and for his suggestions for adding a new feature to the claims.

### **Claim Rejections - 35 U.S.C. 103**

The rejection of claims 9-33 under 35 U.S.C. 103(a) as being unpatentable over Wilson et al. in view of Alperovich is respectfully traversed for at least the following reasons:

Wilson does not suggest configuring a SIM card of a mobile terminal device in such a manner that with the SIM card the terminal device can be *connected* to only

*defined* destination or source *addresses*, or both, as required by claim 9. Examples of such *defined* destination and source *addresses* are recited in the Specification and in the dependent claims as phone numbers, URLs (Uniform Resource Locators), and APN's (Access Point Names).

Wilson does not not suggest limiting use of a mobile telecommunications terminal device by using, in the terminal device, a SIM card that permits *connections* only to *defined* destination or source *addresses*, or both, as required by claim 33. This feature permits the mobile phone subscriber relationship associated with the SIM card to be limited to a defined virtual private network (VPN).

Wilson merely discloses *location* based services, wherein a user of a mobile terminal device can add a mobile number (address) of a friend to a friends list in a SIM card of his mobile device to thereby permit (or deny) the friend to *learn the location* of the user's mobile device.

In paragraph [0129], Wilson discloses the use of a SIM card in a mobile terminal device for storing a first list of the mobile device user's friends, who may receive, via a telecommunication network, a current *location* of the user's mobile terminal device; a second list of the user's friends who have permitted the user's mobile terminal device to receive, via the network, a *location* of wireless devices associated with the user's friends; and a third "deny always" list of friends to whom the user wishes to always deny his or her *location*. See also paragraphs [0037-0038] and [0151], and claims 1 and 32 of Wilson.

Wilson neither discloses nor suggests the claimed function of *limiting connection* of their terminal device *to only* defined destination and/or source *addresses* that are

stored in a SIM of their terminal device or in a database of a mobile communication network, as required by claims 9 and 33.

During the interview on 14 October, Examiner Wendell explained that his reason for asserting that Wilson anticipated the claimed function of *limiting connection* of a terminal device *to only* defined destination and/or source *addresses* that are stored in a SIM of the terminal device was that the function disclosed by Wilson of *permitting* only friends identified by *addresses* stored in a SIM of a terminal device *to learn the location* of the terminal device is a **species** of the claimed function. In essence the Examiner is asserting that the function of *permitting* only friends identified by *addresses* stored in a SIM of a terminal device *to learn the location* of the terminal device is a species of the claimed function of *limiting connection* of a terminal device *to only* defined destination and/or source *addresses* that are stored in the SIM of the terminal device. Applicants strongly disagree.

It is respectfully submitted that the Examiner's "species" explanation is unreasonable because *learning the location* of a person's terminal device is *not* a **species** of *limiting the address to which* the terminal device can be *connected*.

Wilson merely disclose managing *permissions for distributing mobile-device-location information*. Wilson neither discloses nor suggests *limiting connections* of *mobile devices to* destination and/or source *addresses* stored in a SIM card of the mobile device or in a database of a mobile communication network, as required by claims 9 and 33 of the present application.

#### **New Claims 34 and 35**

During the interview on 14 October, Examiner Wendell suggested that some of

the subject matter described in the present application at page 5, lines 3-19 (paragraph [0037] of the published application) be added to the independent claims. A draft of new dependent claims 34 and 35 based upon the disclosure of said paragraph was sent to Examiner Wendell on 14 October for his consideration. On 16 October, Examiner Wendell called Attorney Callan and stated that new claims 34 and 35 would overcome the prior art references of record, but that he would have to conduct a comprehensive search directed to the subject matter of new claims 34 and 35 if such new claims were to be presented in an amendment filed with a Request for Continued Examination.

#### **Conclusion**

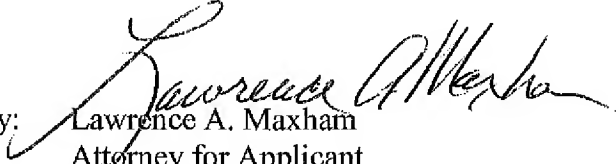
Applicants do not necessarily agree with any of the Examiner's comments regarding the applicability of the cited references to any of the claims. However, in view of the reasons presented herein for allowance of the claims, applicants are not presenting additional arguments at this time. Applicants reserve the right to present additional arguments for traversing the present and any future rejections of the claims.

Reconsideration and allowance of claims 9-35 are respectfully requested. Should an issues remain unresolved, Examiner Wendell is invited to contact the undersigned attorney.

Respectfully submitted,

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